

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
NORTHERN DIVISION  
2:11-CR-00004-D-1

UNITED STATES OF AMERICA	)	MOTION FOR EXTENSION OF TIME
	)	TO FILE MEMORANDUM IN SUPPORT
v	)	TO THE DEFENDANT'S PRO SE MOTION
	)	FOR COMPASSIONATE RELEASE
DEMETRIUS SPENCE	)	

NOW COMES the defendant, Demetrius Spence, by and through his undersigned attorney, Nardine Mary Guirguis, and moves this Honorable Court for an order extending the time to file the Memorandum in Support to the Defendant's Pro-Se Motion for Compassionate Release in the above referenced case. The defendant respectfully shows unto the Court the following in support of this motion:

1. Undersigned counsel entered her appearance in the above referenced case on December 9, 2020 pursuant to Standing Order 19-SO-3; that is, to determine whether the Defendant may qualify to seek a reduction of his sentence through the First Step Act's Compassionate Release.
2. Prior to that, on December 4, 2020, Mr. Spence filed a pro se Motion for Compassionate Release [DE 182].
3. An order to appoint counsel was filed on December 7, 2020, [DE 184], and counsel is given 15 days from the date of the filing to submit and file a memorandum in support. Given that undersigned counsel has not received any supporting documents from Mr. Spence, undersigned is requesting additional time to ensure that she renders effective assistance of counsel.

4. Additionally, in order to properly ascertain the details and support for his Compassionate Release Claim, it is imperative that undersigned counsel obtain and review such documents before filing a Memorandum in Support.
5. This request is not being made for the purposes of delay, but to ensure a complete and accurate response to the Memorandum in Support.
6. Moreover, undersigned counsel has reached out to Assistant United States Attorney Asia Prince regarding his position and he does not object to the continuance of this Motion.

WHEREFORE, the defendant respectfully requests this Honorable Court to enter an order continuing the deadline for the defendant's memorandum in support to January 3, 2021.

Respectfully submitted, this 22nd day of December 2020.

GUIRGUIS LAW, PA

/s/Nardine Mary Guirguis

Nardine Mary Guirguis

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*Designation: CJA Appointed*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served upon the Assistant Attorney for the United States electronically at the following address:

Asia Prince  
Assistant United States Attorney  
Asia.prince@usdoj.gov  
150 Fayetteville Street, Suite 2100  
Raleigh, NC 27601

This 22nd day December 2020.

GUIRGUIS LAW, PA

/s/ Nardine Mary Guirguis  
Nardine Mary Guirguis  
PANEL Attorney